

EXHIBIT O

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF FILOMENA ROMAN

I, Filomena Roman, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I worked for the Center for Employment Opportunities as a Career Advancement Specialist. Attached as Exhibit B is a true and correct copy of my proof of employment with the Center for Employment Opportunities during the events of the 9/11 terrorist attacks.

4. I arrived at work at 8:00 a.m. on the morning of 9/11. I was in my office near the World Trade Center when the passenger jets struck the North and South Towers. After the South Tower collapsed, the New York Police Department ordered the evacuation of my building. As I exited the building, the atmosphere was incredibly dark and thick with ash and dust, and I had a

difficult time seeing where I was going. I inhaled large quantities of this building debris and dust into my lungs and airways.

5. I then slipped on some of the debris while exiting the area in front of my building, and I heard a loud snap in my left foot. Despite my foot pain, I continued to run and walk away from the World Trade Center area as quickly as possible to escape the chaos and carnage. As I moved as quickly as possible away from the area and towards the Brooklyn Bridge and then the Queens Bridge, my face began to burn and itch. I realized that I was covered in ash and debris. I had difficulty breathing and my left foot continued to ache.

6. Despite my physical pain and my emotional state after having survived this traumatic situation, I somehow made my way to Queens and I entered North Shore Hospital's Emergency Room and I received initial treatment for my injuries.

7. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a fractured left foot¹; a sprained left ankle²; arthralgia³; a condition known as Reflex Sympathetic Dystrophy⁴ (which affects my lumbosacral spine and lower extremities); nerve injuries to my legs⁵; back pain⁶; cervical spine pain⁷; asthma⁸; reactive airway disease⁹; shortness of breath¹⁰; acute sinusitis¹¹; headaches¹²; blurred vision¹³; ataxia¹⁴;

¹ See, Medical Records of Filomena Roman (ROMAN_MEDS_000001), attached hereto as Exhibit C, at 0012, 0025, 0028

² *Id.*, at 0001-0002, 0004, 0007-0008, 0011-0013, 0028

³ *Id.*, at 0037

⁴ *Id.*, at 0012-0013, 0015, 0018, 0024, 0028, 0032-0033, 0037, 0039-0040, 0044-0045

⁵ *Id.*, at 0017, 0037

⁶ *Id.*, at 0037

⁷ *Id.*, at 0025

⁸ *Id.*, at 0013, 0018, 0030, 0035, 0042-0045, 0049

⁹ *Id.*, at 0007, 0013, 0015, 0017-0020, 0024-0025, 0029, 0032

¹⁰ *Id.*, at 0020

¹¹ *Id.*, at 0035

¹² *Id.*, at 0024, 0037, 0039, 0041-0042, 0047

¹³ *Id.*, at 0018, 0037, 0039, 0047

¹⁴ *Id.*, at 0037

lightheadedness¹⁵; dizziness¹⁶; acid reflux symptoms¹⁷ and GERD¹⁸. Due to my Reflex Sympathetic Dystrophy caused by the events of 9/11, I have been deemed totally disabled by the Social Security Administration.

8. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events. I have been diagnosed with a major depressive disorder with recurrence, post-traumatic stress disorder¹⁹, and depression²⁰. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

9. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

10. I have also attached herein as Exhibit D to this Declaration a true and correct copy of a letter from the September 11th Victim Compensation Fund (VCF) in which the VCF certified my eligibility for compensation for my 9/11 injuries, including my “traumatic injury-leg/foot injury”, and my “RADS/Asthma”.

11. As referenced above, I previously pursued a claim through the VCF (VCF No. 0003590) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

¹⁵ *Id.*, at 0037, 0039

¹⁶ *Id.*, at 0039, 0041

¹⁷ *Id.*, at 0029-0030, 0032-0033

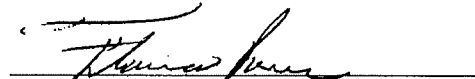
¹⁸ *Id.*, at 0029

¹⁹ *Id.*, at 0017, 0025, 0035, 0044-0045

²⁰ *Id.*, at 0017

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 15th day of November 2021.


Declarant Filomena Roman

**CITIZENSHIP
AND
MEDICAL
EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**

Exhibit B

Proof of Employment

APR-28-03 04:21 PM CEU

Center for Employment Opportunities
 Neighborhood Work Project
 Vocational Development Program



David E. Moskovitz

Chairperson

Mindy S. Tarlow

Executive Director

Board of Trustees

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Secretary

Fred Dudding

Treasurer

April 11, 2003

Binder & Cohen, LLP
 265 Post Avenue
 Suite 116
 Westbury, NY 11590

RE: Filomena Roman

To Whom It May Concern:

This is to notify you that on September 11, 2001, Filomena Roman was employed by CEO at our offices at 32 Broadway, New York, NY. At the time of her employment she was earning [REDACTED].

At the time of the attack we were forced to vacate the premise. Subsequently, it was learned that Filomena Roman was injured on September 11, 2001.

She has not returned to work for CEO since September 11, 2001.

Should you have any questions, please contact me at 212-612-5162.

Regards.

Peggy Muñoz
 Director of Human Resource
 Center for Employment Opportunities

212-000222-0040

Center For Employment Opportunities
 12 Broadway | New York, New York 10004

Telephone: 212-422-4430 | Fax: 212-422-4855
 Web Site: <http://www.ceoworks.org>

CEO is a nonprofit corporation

Exhibit 1

Exhibit D

Victim's Compensation Fund Injury Eligibility Letter



September 11th
Victim Compensation Fund

July 6, 2015

FILOMENA ROMAN
C/O JODI FLOWERS
MOTLEY RICE, LLC
PO BOX 650001
MT. PLEASANT SC 29465-6501

Dear FILOMENA ROMAN:

The September 11th Victim Compensation Fund ("VCF") previously sent you an Eligibility determination letter on August 15, 2013 explaining the outcome of the review of your Eligibility Form. Your claim number is [REDACTED]. The letter included a list of condition(s) deemed eligible for compensation. You then amended your claim to add one or more new conditions.

The VCF has considered your amended claim and reviewed the new information you provided. This letter sets forth the revised eligibility determination and supersedes and replaces the previous letter.

The Decision on your Claim

Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, you have been found eligible for the injuries listed below. *This list includes all injuries for which you have been found eligible.*

- **TRAUMATIC INJURY – LEG/FOOT INJURY**
- **RADS/ASTHMA**

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or loss calculation.

What Happens Next

The VCF is working on your compensation claim. **If you believe your new condition(s) changes your compensation claim**, you should amend your claim. For example, if you have additional medical expenses or if your new condition is the reason you are not able to work, you should provide that information to the VCF by amending your claim. Please see the www.vcf.gov website for additional details on how to amend your claim.

If your newly eligible condition(s) does not change your compensation claim, you do not need to take any action at this time.

If in the future you are diagnosed with a new 9/11-related condition or if the WTC Health Program certifies you for treatment for a condition that was not previously certified, you may



September 11th
Victim Compensation Fund

amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

Please remember all information and materials must be submitted to the VCF by October 3, 2016.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Sheila L. Birnbaum
Special Master
September 11th Victim Compensation Fund